

Peter S. Partee, Sr.
Robert A. Rich
HUNTON & WILLIAMS LLP
200 Park Avenue, 53rd Floor
New York, New York 10166-0136
Telephone: (212) 309-1000

Presentment Date and Time: May 6, 2014 at 12:00 p.m.
Objection Deadline: May 6, 2014 at 11:30 a.m.

*Attorneys for Edward Zraick Jr., Nancy Zraick,
Patricia DeLuca and Karen Rich*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF STIPULATION
AND ORDER FOR SUBSTITUTION OF COUNSEL**

PLEASE TAKE NOTICE that the undersigned counsel will present the annexed Stipulation and Order to substitute Hunton & Williams LLP for Becker & Poliakoff LLP as counsel for Edward Zraick Jr., Nancy Zraick, Patricia DeLuca and Karen M. Rich (the “Stipulation”) to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for approval and signature at Room 723 of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 on **May 6, 2014 at 12:00 p.m. (prevailing Eastern Time).**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Stipulation (i) must be in writing; (ii) shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Bankruptcy Court (iii) be filed in accordance with General Order M-399, which can be found at www.nysb.uscourts.gov; (iv) shall set forth the name of the objecting party and the basis for the objection and the specific grounds therefore; (v) shall be filed with the Clerk of the Bankruptcy Court (with a courtesy copy delivered directly to the Chambers of the Honorable Stuart M. Bernstein), together with the proof of service thereof; and (vi) shall be served in a manner so as to actually be received by (a) Hunton & Williams LLP, counsel for the Debtors, 200 Park Avenue, 53rd Floor, New York, New York 10166-0136, Attn: Peter S. Partee, Sr., Esq. and Robert A Rich, Esq.; and (b) Becker & Poliakoff LLP, 45 Broadway, New York, New York 10006, Attn. Helen Davis Chaitman, Esq.; no later than **May 6, 2014 at 11:30 a.m. (prevailing Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE THAT, in the event that no objection to the entry of the Stipulation is timely served and filed by the Objection Deadline, the Court may sign and enter the Stipulation without further notice or hearing.

Dated: May 1, 2014
New York, New York

HUNTON & WILLIAMS LLP

/s/ Robert A. Rich
Peter S. Partee, Sr.
Robert A. Rich
200 Park Avenue, 53rd Floor
New York, New York 10166-0136
Telephone: (212) 309-1000

Attorneys for Edward Zraick Jr., Nancy Zraick, Patricia DeLuca and Karen Rich

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL

This stipulation (the “Stipulation”) is entered by and between undersigned counsel pursuant to Rule 2090-1(e) of the Local Rules for the United States Bankruptcy Court for the Southern District of New York.

WHEREAS, Helen Davis Chaitman of Becker & Poliakoff LLP represents Edward Zraick Jr., Nancy Zraick, Patricia DeLuca and Karen M. Rich (collectively, the “Claimants”) in connection with their customer claims filed in the above-captioned SIPA proceeding;

WHEREAS, Peter S. Partee, Sr. and Robert A. Rich of Hunton & Williams LLP represent the Claimants in connection with the adversary proceeding filed by Irving H. Picard, as Trustee, against the Claimants, captioned Irving H. Picard, Trustee v. Edward A. Zraick, et al., Adv. Pro. No. 10-05257 (SMB);

WHEREAS, the Claimants believe that there exist common issues in both the SIPA proceeding and the adversary proceeding such that it would be more efficient to have Hunton & Williams LLP represent the Claimants in both cases;

NOW THEREFORE, the undersigned counsel hereby stipulate and agree as follows:

1. Hunton & Williams LLP, 200 Park Avenue, New York, New York 10166 shall be substituted for Becker & Poliakoff LLP, 45 Broadway, New York, New York 10006, as counsel of record for the Claimants in the above-captioned proceeding.
2. This Stipulation may be executed in any number of counterparts, each of which shall, when executed, be deemed to be an original and all of which together shall be one and the same instrument. Facsimile or electronic signatures on this Stipulation shall be deemed the same as originals.

Dated: New York, New York
May 1, 2014

HUNTON & WILLIAMS LLP

/s/ Robert A. Rich

Peter S. Partee, Sr.
Robert A. Rich
200 Park Avenue, 53rd Floor
New York, New York 10166-0136
(212) 309-1000

BECKER & POLIAKOFF LLP

/s/ Helen Davis Chaitman

Helen Davis Chaitman
45 Broadway
New York, New York 10006
(212) 599-3322

SO ORDERED this __ day of May, 2014

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE